

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

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CHAPTER 11

In re:

Case No. 10-42609-jbr

80-20 Realty Management, Inc.,

Debtor.

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STIPULATION RESOLVING OBJECTION TO PLAN

Whereas, 80-20 Realty Management, Inc., filed an amended plan of reorganization (the "Plan") on December 30, 2010;

Whereas, CVM Partners 1, LLC ("CVM Partners 1") is the holder of mortgages on properties owned by the Debtor at 80 Conklin Street, Binghamton, New York and 20 Conklin Street, Binghamton, New York;

Whereas, CVM Partners 1 filed an objection to confirmation of the Plan and submitted a ballot rejecting the Plan;

Whereas, the Debtor and CVM Partners 1 have discussed resolution of this dispute and reached an agreement;

Now, therefore it is agreed as follows:

1. Article II(c) of the Plan is amended in its entirety to provide as follows:
 - a. that upon the Effective Date, the Debtor shall pay to CVM Partners 1 \$9,410.22 on account of the 80 Conklin property (CVM Partners 1 Loan No. 11323004) and \$3,374.30 on account of the 20 Conklin property (CVM Partners 1 Loan No. 11323005);
 - b. the Debtor will continue to make the monthly payments to CVM Partners 1 on both mortgages at the interest rate provided in the applicable Notes;

c. CVM Partners 1 shall accept the payments as provided in paragraph 1(a) of this Stipulation in full settlement of the Debtor's pre-petition arrears and other charges owed by the Debtor;

d. upon receipt and clearance of the payments set forth in paragraph 1 of this stipulation, so long as the Debtor complies with the Plan and is not in default, the mortgage loans shall be re-instated;

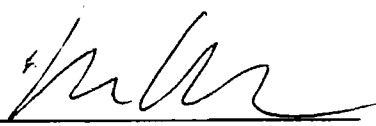
e. CVM Partners 1 shall retain its liens on the 20 Conklin Avenue and 80 Conklin Avenue properties and UCC liens on the Debtor's personal property until each mortgage is fully satisfied.

3. The Debtor waives any claims or defenses it may have regarding the amount due under each CVM Partners 1 mortgage.

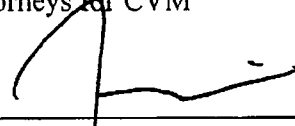
4. CVM Partners 1 withdraws its objection to the Plan and withdraws its ballot rejecting the Plan. CVM Partners 1 accepts the Plan as amended by this Stipulation.

Dated: May 19, 2011

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